

Exhibit A			
No.	Category	Trustee's Proposed Document Requests ¹	Rule 2004 Subpoena ²
1.	Due Diligence	<ul style="list-style-type: none"> • “Documents concerning...due diligence...involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (1) 	<ul style="list-style-type: none"> • “[D]ocuments concerning any due diligence” conducted by RBC³ concerning BLMIS or any Fund with a BLMIS Account. (21-23) • “[D]ocuments concerning any due diligence on BLMIS” performed by any investment bank or financial institution. (49)
2.	Ongoing Monitoring of Investments & Transactions	<ul style="list-style-type: none"> • Documents concerning “...ongoing monitoring of any investments or transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (2) • Examples of documents include “account statements”, “trade tickets”, “audit information”, documents discussing “performance or purported returns” and “regulatory filings.” (1) 	<ul style="list-style-type: none"> • “[D]ocuments concerning BLMIS.” (2) • “[D]ocuments concerning communications between you and ...BLMIS,” “between you and any Fund with a BLMIS account,” “with any person, other than BLMIS, concerning BLMIS,” or “concerning any Fund with a BLMIS Account.” (15-16; 18-19) • Documents concerning BLMIS’ accountants and auditors. (40-41)

¹ See Exhibit B to the Declaration of Howard L. Simon, dated August 28, 2014, Adv. Pro. No. 08-01789 (SMB), Dkt. No. 7833-3 (“Proposed Limited Document Demands”).

² See Exhibit A to the Declaration of Anthony L. Paccione, dated October 6, 2017, Adv. Pro. No. 08-01789 (SMB), Dkt. No. 16728-1 (Subpoena for Rule 2004 Examination to Royal Bank of Canada, dated July 28, 2009) (the “Rule 2004 Subpoena”).

³ The Rule 2004 Subpoena defined “RBC,” “you,” and “your” to mean “Royal Bank of Canada and any parent, subsidiary, affiliate, division, branch, agency, representative office, predecessor, successor, principal, member, officer, director, shareholder, manager, employee, agent, or representative thereof.” See Declaration of Anthony L. Paccione, dated October 6, 2017, Adv. Pro. No. 08-01789 (SMB), Dkt. No. 16728, at ¶ 3 (quoting Rule 2004 Subpoena). In response to the Subpoena, Royal Bank of Canada produced thousands of documents, some of which were from the files of RBC Alternative Assets, L.P. *Id.*, at ¶ 5.

			<ul style="list-style-type: none"> Documents concerning “return on investment.” (42) Documents concerning “BLMIS’ Form 13F filings with the [SEC].” (45)
3.	Risk Analysis	<ul style="list-style-type: none"> Documents concerning “review” and “analysis” including those related to “Operational Risk, credit risk, compliance, or market risk.” (1-2) Documents concerning any “investment committee”, “investment advice”, “risk analysis” or “legal opinions.” (2) 	<ul style="list-style-type: none"> Documents concerning “opinions, research, or advice concerning investments with BLMIS.” (50)
4.	Investment Decisions	<ul style="list-style-type: none"> “Documents concerning Defendant(s)’ investment decision, evaluation, approval, disapproval...of any investments or transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (2) 	<ul style="list-style-type: none"> Documents concerning RBC’s investments in Fairfield Sentry or any Fund with a BLMIS Account. (4-5) “[D]ocuments concerning any actual or proposed investments” in accounts managed by BLMIS, or with any Fund with a BLMIS Account. (9-10) Documents concerning “opinions, research, or advice concerning investments with BLMIS.” (50)
5.	Illegality or Insolvency	<ul style="list-style-type: none"> “Documents concerning fraud, Ponzi, illegality, front-running, investigations, insolvency, or embezzlement at BLMIS or Feeder Funds.” (3) 	<ul style="list-style-type: none"> Documents concerning “BLMIS’ financial condition, solvency, or ability to timely pay its debts.” (34) Documents concerning the “legality of BLMIS’ operations.” (38) “[D]ocuments concerning the feasibility of BLMIS’ returns on investments.” (39) Documents concerning any “investigation of BLMIS by any government agency or official.” (43-44)

6.	Remuneration	<ul style="list-style-type: none">• “Documents concerning fees, rebates, commissions, retrocessions, or any other remuneration paid to or by Defendant(s), related to investments and transactions involving BLMIS, Feeder Funds, or BLMIS-Related Investment Products.” (4)	<ul style="list-style-type: none">• “[D]ocuments concerning any remuneration...in the form of commissions, management fees, performance fees, shares, salary or other forms of payment” received by or for the benefit of RBC, resulting from the purchase of Fairfield Sentry or Fairfield Sigma shares and investments in BLMIS or any Fund with a BLMIS Account. (24-26)
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